



AMERICAN SAMOA GOVERNMENT
PAGO PAGO, AMERICAN SAMOA 96799

In reply refer to:

**REQUEST FOR PUBLIC COMMENT ON
WORKFORCE INVESTMENT WAIVER REQUEST
WAIVER TO REPLACE STATUTORY PERFORMANCE MEASURES WITH COMMON MEASURES**

Public Comment

The Department of Human Resources, Employment & Training Division is the Territorial/State Administrative Entity for the Workforce Act (WIA). The ETD of Department of Human Resources invites public comments regarding the Waiver request provided below.

Statutory and/or Regulatory Requirements To Be Waived

American Samoa is requesting to implement the Common Measures and Waive the current statutory requirement of the 17 performance indicator.

Actions Undertaken To Remove State Or Local Barriers

There are no state or local statutory or regulatory barriers to implementing the waiver.

Goals and Expected Programmatic Outcomes Of Waiver

- Improve services to youth and increase focus on out-of-school youth.
- Reduces administrative costs by eliminating paperwork and labor costs associated with performance data collection.
- Provides a more useful program management tool.
- Provides for customer-driven instead of program-driven outcomes.
- Provide an opportunity for the Territory to better implement the USDOL's Youth Vision

Approval of this waiver will continue to streamline administrative processes, allowing the Department of Human Resources-Employment and Training (DHR-ETD) to focus the maximum amount of resources on employment outcomes. This waiver will further DHR-ETD's implementation of the federal goal to simplify and streamline the performance accountability system.

Approval of this waiver request will also allow DHR-ETD to improve consistency and reliability of data, and foster greater flexibility when negotiating performance measures with the Workforce Development Commission of American Samoa (WDCAS). In addition, limiting performance reporting to the Common Measures will simplify service delivery as well as data collection, reporting, and validation at the local level.

Individuals Impacted By the Waiver

Employers, job seekers, Territory and local staff will benefit from this waiver. The implementation of integrated Common Measures will allow staff to better focus on the needs of employers, find job seekers to match those, and maximize integrated services to achieve the best outcomes. The waiver will provide accountability while improving program management and performance.

Implementing the Common Measures will increase focus in youth programs on education and skill attainment. Focusing only on Youth Common Measures will remove a significant barrier by aligning the Territory's WIA Youth program with DHR-ETD's vision of serving at-risk out-of-school-youth, as well as fostering youths' long-term connections to the workforce system. The hardest-to-serve youth groups, such as former incarcerated youth, and current and former foster care youth, have derived the most benefit from long-term connection to the workforce.

Process For Monitoring Progress In Implementation

DHR-ETD will continue to monitor progress under this waiver by reviewing monthly performance through monitoring and performance accountability reports that measure results. Adjustments will continue to be made by monitoring performance requirements to ensure performance goals and objectives are met. Information regarding the reporting system and the waiver will be shared with the Workforce Development Commission of American Samoa (WDCAS) through training and technical assistance, the distribution of policy through Workforce Development Policies and Issuances and regularly administrative WIA meetings.

Notice To Affected Local Boards

American Samoa is a single Service Delivery and the Workforce Development Commission of American Samoa (WDCAS) has local board responsibilities. The draft waiver will be posted on the www.americansamoa.gov website, and all board members will be notified it is available for review and comment.

The Waiver request will be submitted to the U.S. Department of Labor on January 16, 2013. Questions or comments on this Waiver should be sent electronically to Ms. Makerita Enesi at likapago@gmail.com and dhredtwia@gmail.com no later than 4:00 pm on Wednesday, January 16, 2013.